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10 Attorneys for Defendant

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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**
14

15 DAVOUD RAKHSHAN,) No. 2:17-cv-02117-JAD-PAL
)
16 Plaintiff,) JOINT STIPULATION FOR EXTENSION
) OF TIME TO RESPOND TO
17 v.) PLAINTIFF'S MOTION FOR
) JUDGMENT ON THE PLEADINGS
18 NANCY A. BERRYILL,)
19 Acting Commissioner of Social Security,) (First Request)
)
20 Defendant.)
21)

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23
24 Plaintiff, Davoud Rakhshan, and Nancy A. Berryhill, Acting Commissioner of Social
25 Security (the Commissioner or Defendant), stipulate, with the approval of this Court, to an
26 extension of time for the Commissioner to respond to Plaintiff's Motion for Judgment on the
27 Stipulation for Extension, No. 2:17-cv-02117 JAD-PAL
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1 Pleadings by 30 days, from March 5, 2018 to April 4, 2017, with all other dates extended
2 accordingly. This is the Commissioner's first request for an extension. She makes it based on
3 the undersigned agency attorney's heavy workload.

4 DATE: March 2, 2018

Respectfully submitted,

5 DAYLE ELIESON
6 United States Attorney

7 /s/ Elizabeth Firer
8 ELIZABETH FIRER
9 Special Assistant United States Attorney

10 DATE: March 2, 2018


Respectfully submitted,

11 /s/ Cyrus Safa
12 CYRUS SAFA
13 Attorney for Plaintiff
14 *per email authorization on March 2, 2018

15 ORDER

16 IT IS SO ORDERED.

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18
19
20 DATED: _ March 7, 2018

BY: 
21 HON. PEGGY A. LEEN
22 UNITED STATES MAGISTRATE JUDGE
23
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25
26

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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused the Stipulation for Voluntary Remand Pursuant to Sentence Four of 42 U.S.C. § 405(g) and for Entry of Judgment to be served, via CM/ECF notice, on:

CYRUS SAFA
Law Offices of Lawrence D. Rohlfing
cyrus.safa@rohlflinglaw.com

GERALD M. WELT
Attorney at Law
gmwesq@weltlaw.com

Date: March 2, 2018

DAYLE ELIESON
United States Attorney

By: /s/ Elizabeth Firer
ELIZABETH FIRER
Special Assistant United States Attorney

Attorneys for Defendant

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